

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Cornel West, Melina Abdullah, Geraldine Tunstalle,)	
Katherine Hopkins-Bot, and Charles Hier)	
)	
)	
Plaintiff,)	
)	2:24-cv-01349
vs.)	
Pennsylvania Department of State and Al Schmidt, in)	Judge J. Nicholas Ranjan
his capacity as Secretary of the Commonwealth)	
)	
)	
Defendants.)	
)	

Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES

1. Subjects of Fact Discovery:

The parties anticipate paper discovery and a handful of depositions regarding these general areas of inquiry: (1) The Department of State's (Department) past and present interpretations and enforcement of 25 P.S. § 2911; (2) the development of the Department's 2024 interpretation of 25 P.S. § 2911; (3) the burden on Plaintiffs to comply with 25 P.S. § 2911 and the Department's interpretation of the same; (4) facts related to submission of Cornel West's nomination papers; (5) Cornel West's identification of presidential electors in Pennsylvania and other states and difficulties associated with identifying and maintaining electors; (6) the Department's interpretation and requirements for major political party presidential candidates and presidential electors; (7) the role of presidential electors.

2. Subjects of Expert Discovery:

At this time, the parties do not anticipate expert discovery.

3. Can fact and expert discovery occur at the same time? Why/why not?

Although the parties do not currently anticipate expert discovery, they agree that expert discovery can occur at the same time as fact discovery if the need for expert discovery arises.

4. Pre-trial Deadlines:

a. Date for Initial Disclosures: 2/5/2025

- b. Date for joinder/amendment: 2/7/2025
- c. Date for close of fact discovery: 8/4/2025
- d. Date for close of expert discovery, if bifurcated: 8/4/2025

5. Do the parties want a Rule 502 non-waiver order - Yes or No?

No

6. Are there any ESI issues to address? If yes, please explain:

The parties do not anticipate any ESI issues.

7. Protective Order - Yes or No? If yes, please explain:

The parties do not require a protective order.

Respectfully submitted,

/s/Stephen R. Kovatis

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*pro hac vice application pending